

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIKKO D'AMBROSIO,

Plaintiff,

v.

ABBIGAIL RAJALA, CAROL RAJALA,
RODNEY RAJALA, PAOLA SANCHEZ,
BLAKE MILLBRAND, META PLATFORMS,
INC., a Delaware Corporation, SPILL THE
TEA, INC., a Delaware Corporation, JANE
DOES 1-26, Unnamed Defendants using screen
names: Sam Daniels, Alexis Kyle, Coraline Lotz,
Dianne Wesley, Madison Pierce, Madison
Bynum, Vanessa Villatoro, Christy Graessle,
Sharleen Waa, Kaitlyn Mishay Moody, Linda
Juarez, Amber Michelle, Laura Maddox, Alina
Drake, Chandi Constance, Alicia Ann, Salisha P.
Dean, Jillian Cara, Jen Rahbar, Shannon Marie,
Luisa Resendez, Daryl Ceasar, Lisa Miko, Amy
Dukstein-Reynolds, Melissa Pinkerton, Monica
Tska

Defendants.

Case No.1:24-cv-00678

District Judge Sunil R. Harjani

**UNOPPOSED MOTION OF DEFENDANT META PLATFORMS, INC. TO
EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Meta Platforms, Inc. (“Meta”) respectfully moves the Court for an unopposed, 21-day extension of time until November 22, 2024, to answer or otherwise respond to Plaintiff’s Second Amended Complaint. In support of this motion, Meta states as follows:

1. On or about January 25, 2024, Plaintiff filed this suit. Dkt. 1.
2. On July 22, 2024, Plaintiff filed his First Amended Complaint. Dkt. 29.

3. On August 21, 2024, Meta filed its Motion to Dismiss the First Amended Complaint. Dkt. 38.

4. On October 11, 2024, in response to Meta's Motion to Dismiss, Plaintiff filed his Second Amend Complaint. Dkt. 53.

5. On October 15, 2024, the Court issued a Minute Order setting November 1, 2024 as the deadline for Meta to answer or otherwise respond to the Second Amended Complaint. Dkt. 54.

6. The Second Amended Complaint alleges six new causes of action against Meta. Meta requires additional time to complete its legal and factual investigation into these new claims and to prepare its responsive pleading.

7. To efficiently respond to the Second Amended Complaint, and thus best to conserve court and party resources, Meta seeks a 21-day extension of time to answer or otherwise respond to the Second Amended Complaint.

8. Meta therefore respectfully requests that the Court set Meta's deadline to answer or otherwise respond to the Second Amended Complaint as November 22, 2024.

9. No prior extensions have been requested or granted to respond to the Second Amended Complaint. On July 26, 2024, Meta filed an unopposed motion for an extension of time to respond to Plaintiff's First Amended Complaint (Dkt. 30), which the Court granted. Dkt. 31.

10. Meta's counsel has conferred with Plaintiff's counsel, and Plaintiff's counsel indicated that Plaintiff does not oppose this motion.

WHEREFORE, Meta respectfully requests that the Court grant this motion extending the deadline of Meta to answer or otherwise respond to Plaintiff's Second Amended Complaint until November 22, 2024.

Dated: October 22, 2024

Respectfully submitted,

/s/ Gary Feinerman

Gary Feinerman, One of the Attorneys for
Defendant Meta Platforms, Inc.

Gary Feinerman (IL 6206906)
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, IL 60611
Telephone: 312-876-7700
gary.feinerman@lw.com

CERTIFICATE OF SERVICE

I, Gary Feinerman, hereby certify that on October 22, 2024, I caused a copy of the foregoing to be filed using the Court's CM/ECF system, which provides service to all counsel of record.

Dated: October 22, 2024

/s/ Gary Feinerman

Gary Feinerman, One of the Attorneys for
Defendant Meta Platforms, Inc.

Gary Feinerman (IL 6206906)
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, IL 60611
Telephone: 312-876-7700
gary.feinerman@lw.com